

HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

A.T., individually,

Plaintiff,

vs.

EVERETT SCHOOL DISTRICT, a public  
corporation; CAROL WHITEHEAD, an  
individual; CRAIG VERVER, an individual,

Defendants

No. 2:16-cv-01536

**MOTION, STIPULATION, AND  
ORDER TO EXTEND DEADLINES**

**COMES NOW** Plaintiff, by and through her undersigned attorneys of record, and hereby moves the Court to extend the deadline for the disclosure of expert witnesses to September 29, 2017.

**THIS MOTION** is based upon all applicable court rules, the affidavit of counsel appended hereto, as well as in the interest of justice.

RESPECTUFLLY SUBMITTED this 29th day of August, 2017

PFAU COCHRAN VERTETIS AMALA, PLLC

By /s/ Darrell L. Cochran

Darrell L. Cochran, WSBA No. 22851

Kevin M. Hastings, WSBA No. 42316

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1 STATE OF WASHINGTON )  
2 : ss  
3 COUNTY OF PIERCE )

4 I, DARRELL L. COCHRAN, hereby declare under penalty and perjury under the laws  
5 of the State of Washington that the following is true and correct:  
6

7 Parties have agreed that with discovery still ongoing and important depositions still  
8 taking place, the deadline for the disclosure of expert witnesses should be extended to  
9 September 29, 2017.

10 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE  
11 STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

12 Signed this 29th day of August, 2017, in Tacoma, Washington.  
13

14 By: /s/ Darrell Cochran  
15 Darrell L. Cochran, WSBA No. 22851  
16 Attorney for Plaintiff  
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MOTION, STIPULATION, AND ORDER TO  
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STIPULATION

Plaintiff and Defendants hereby stipulate to extend the deadline for the disclosure of expert witnesses to September 29, 2017.

Presented by:

PFAU COCHRAN VERTETIS AMALA PLLC

By: /s/ Darrell L. Cochran

Darrell L. Cochran, WSBA No. 22851  
Kevin M. Hastings, WSBA No. 42316  
Attorneys for Plaintiffs

Approved as to form:

LAW OFFICES OF COGDILL NICHOLS REIN WARTELLE ANDREWS

By /s/ Michael J. Andrews

Michael J. Andrews, WSBA No. 26176  
Attorney for Defendant

PATTERSON BUCHANAN FOBES & LEITCH

By /s/ Charles Leitch

Charles Leitch, WSBA No. 25443  
Haley Moore, WSBA No. 48076  
Attorneys for Defendant

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**ORDER**

**THIS MATTER** having come in the above captioned matter, on the Motion, Stipulation, and Order to Extend Deadlines, and the Court being fully appraised after reviewing the record and finding the motion to be in order; **NOW THEREFORE,**

**IT IS HEREBY ORDERED, ADJUDGED and DECREED** that the Expert Witness Disclosure deadline is extended to September 29, 2017. *The court is not, however, inclined to extend any other remaining pretrial deadlines.*

DATED this 30th day of August, 2017.

  
JUDGE JAMES ROBART

MOTION, STIPULATION, AND ORDER TO  
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